

## AW OFFICES OF JILL R. SHELLOW PLLC

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January 1, 2025

**BY ECF AND EMAIL**

The Honorable Mary Kay Vyskocil  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007  
[VyskocilNYSDChambers@nysd.uscourts.gov](mailto:VyskocilNYSDChambers@nysd.uscourts.gov)

**RE: *United States v. Kenneth Fortune, 23 Cr. 301 (MKV)***

Dear Judge Vyskocil:

I represent Kenneth Fortune, and I'm writing to request a temporary modification of the terms of his pretrial release. The conditions of Mr. Fortune's release include a \$100,000 PRB and travel restricted to the SDNY and EDNY.

Mr. Fortune respectfully requests that Your Honor permit him to travel to Taunton, Massachusetts from January 16-19, 2025 to visit his uncle, Yves Toussant, with whom he is particularly close. Mr. Fortune has given me Mr. Toussant's address, and PTS requires Mr. Fortune to provide proof of his travel and lodging details. The Government defers to the position PTS. PTS consented when I requested travel from January 6-9, but there was a mistake in the dates. The correct dates are January 16-19, 2025. Several days ago, I asked the Government and PTS whether the change in dates would alter their position. The Government responded that its position was the same. I have not yet received a response from PTS.

Thank you for your consideration.

Respectfully submitted,



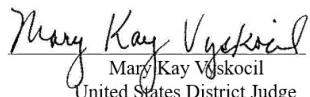
Jill R. Shellow

cc: AUSA Katherine Cheng  
 Pretrial Services Officer Taelor Nisbeth

Admitted: NY, CT, DC

**DENIED. The Clerk of Court is respectfully requested to close the docket entry at ECF No. 77. SO ORDERED.**

Date: 1/2/2025  
 New York, New York



Mary Kay Vyskocil  
 United States District Judge